

Applicant : Udo Klein et al.
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Filed : August 28, 2003
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Attorney's Docket No.: 15609-017001 / 2003P00621 US

BEST AVAILABLE COPY**Amendments to the Drawings:**

The attached replacement sheets of drawings includes changes to Figures 3, 5, 6, 9, 12A, 12B, 16A, 16B, 18A, 18B, 19A, 19B and 20A, and replaces the original sheet including Figures 3, 5, 6, 9, 12A, 12B, 16A, 16B, 18A, 18B, 19A, 19B and 20A.

In Figures 3, 5, 6, 9, 12A, 12B, 16A, 16B, 18A, 18B, 19A, 19B and 20A, amendments are made to eliminate partial views.

Attachments following last page of this Amendment:

Replacement Sheet (9 pages)

Annotated Sheet Showing Change(s) (9 pages)

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REMARKS

In the non-final Office Action mailed May 1, 2006, the Examiner rejected all of the claims 1-20 that are pending, and objected to the drawings. Applicants have amended claim 1 above. Accordingly, claims 1-20 remain pending. Applicants request reconsideration of claims 1-20 and the drawings in view of the amendments and the following remarks.

Information Disclosure Statement

The Examiner has objected to the Information Disclosure Statement, which included a PTO form 1449 that referenced a declaration signed by the inventor pertaining to non-prior art activities that occurred more than one year before the application filing date. Applicants note that the declaration should not have been listed on the form 1449 and ask the Examiner to disregard it. Applicants request, however, that the Examiner consider the information provided in the declaration and the Information Disclosure Statement transmittal form which shows the activities do not constitute prior art. While it was perhaps unnecessary for Applicants to submit these materials in connection with this application filing because it is not material to the examination, Applicants nevertheless submit in abundance of caution in case the Examiner felt it was material.

In summary, Applicants ask the Examiner indicate she reviewed the declaration and attached materials and agrees activities were not prior art. In addition, Applicants ask that the Examiner remove the objection to the Information Disclosure Statement.

Drawing Objections

The Examiner objected to several of the drawings because of partial views. In response, Applicants have amended Figures 3, 5, 6, 9, 12A, 12B, 16A, 16B, 18A, 18B, 19A, 19B and 20A to eliminate partial views. Accordingly, Applicants ask that the Examiner remove the objection to the Figures.

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Claim Rejections – 35 U.S.C. § 101

The Examiner rejected claims 1-9 under 35 U.S.C. § 101 as allegedly not being drawn to statutory subject matter. The Examiner stated that the claims as presently written lack utility and are not tangible. Applicants have amended claim 1 to specify that the method is computer implemented, which amendment is believed to overcome the Examiner's concerns with respect to claim 1 and dependent claims 2-9.

Accordingly, Applicants ask that the Examiner withdraw the Section 101 rejection of claims 1-9.

Claim Rejections – 35 U.S.C. § 103

The Office Action rejected all of the independent claims 1, 9 and 16 (as well as all dependent claims) under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application No. 2005/0177587 A1 to Mukundan et al. (**Mukundan**), in view of U.S. Patent No. 6,122,649 to Kanerva et al. (**Kanerva**).

In particular with respect to claim 1, for example, the Office Action states that **Mukundan** teaches the invention substantially, but does not explicitly teach a grouping value. The Office Action contends that **Mukundan** teaches logical grouping or mappings may be defined to associate identified fields for changes, and contends that **Kanerva** teaches automatic synchronization of the contents of the source field values (i.e., group values) with linked property values. The Office Action further contends it would have been obvious to one of ordinary skill at the time of the invention to have combined **Kanerva** with **Mukundan** because a grouping value would enable contents of the first field to be dynamically linked and synchronized with the contents of the second field.

Applicants respectfully submit that **Kanerva**, **Mukundan**, or their combined teachings do not render obvious the subject matter set forth in Applicants' independent claims 1, 9 and 16.

Applicants' independent claim 1, for example, is directed to a method of changing grouping values in a data model. The method comprises selecting a first data record stored at a first level of a data model, the first data record being connected to other first-level data by way of central data stored at a second level of the data model. The method also comprises associating

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the first data record with a grouping value that is generated based on a pre-determined grouping reason. The method additionally comprises selecting a second data record stored at the first level. The method further comprises associating the second data record with the grouping value, such that a modification of the first data record will result in a synchronizing modification of the second data record.

Mukundan is a very lengthy patent reference that describes numerous aspects of business software applications that operate in a Web-based environment to retain the look-and-feel of desktop-based applications with which users are already familiar. (Para. 0009). One of the aspects of the reference that the Examiner has relied upon appears in the Abstract, and relates to a method in which a first field and a second field of a data record are displayed to a user using a client program, and the second field has one or more attributes that are dependent upon the value of the first field. (Abstract.) **Mukundan** discloses that, in response to a detection that the value of the first field has changed, the value of the first field is sent to a server program that is configured to process the change in value of the first field and determine corresponding changes with respect to the one or more attributes of the second field. (Abstract.) **Mukundan** further discloses that the corresponding changes with respect to the one or more attributes of the second field are sent from the server program to the client program.

Kanerva relates to a spreadsheet software application such as Excel, and in particular, discloses a method that includes creating user defined properties, and linking the properties to content of a document (i.e., to a selected cell of a spreadsheet document being created using the spreadsheet application). (Col. 4, lines 40-67.) **Kanerva** discloses that if a value for a property linked to a spreadsheet cell is changed when the spreadsheet document is closed, later when the spreadsheet document is opened there is an automatic synchronization of the changed property to the linked spreadsheet cell. (Col. 5, line 33 to col. 6, line 39.)

Neither **Mukundan** nor **Kanerva**, nor their combined teachings, discloses or suggests a method that includes, as required by claim 1, associating two data records (a first data record and a second data record) with a grouping value that is generated based on a predetermined grouping reason, such that a modification of the first data record will result in a synchronizing modification of the second data record. Indeed, **Mukundan** does not disclose the use of a

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grouping value, as the Examiner has conceded, and moreover, **Mukundan** does not disclose a grouping value that is generated based on a predetermined grouping reason. In addition, even if considering the source field values (e.g., spreadsheet cells) disclosed in **Kanerva**, which source field values are linked with property values, and in particular considering a source field value to be the claimed "grouping value" of Applicants' claim 1, the "source field value" is not a value that is generated based on a predetermined grouping reason, as claim 1 requires.

The Examiner's contentions with respect to claim 1, specifically with respect to the Examiner's characterizations of **Mukundan**, do not seem to address these specific and important distinctions in Applicants' claim 1, and thus do not carry the Examiner's burden in support of the claim rejections.

In addition, **Mukundan** and **Kanerva**, even if their teaching are combined, do not render the subject matter of Applicants' claim 1 obvious. The use of a grouping reason to generate a grouping value to which data records may be associated provides important advantages that are not possible with the methods disclosed in **Mukundan** and **Kanerva**. In particular, as shown in Applicants' Figure 3, different grouping values may be associated with different data records for different reasons (e.g., payment, overtime calculation, etc.). As such, there may be one grouping of assignment data records for a particular nurse for payment reasons, and a different grouping of assignment data records for the nurse for overtime calculation purposes. In general, the method set forth in Applicants' claim 1 addresses the specific challenges that some data modifications are neither universal nor inherently well defined. (Applicants' specification, at page 1, lines 21-28; page 28, lines 18-24.)

Accordingly, Applicants submit that independent claim 1 defines subject matter that is patentable in view of **Mukundan** and **Kanerva**, as do dependent claims 2-8, and ask that the Examiner remove the obviousness rejection of claims 1-8 based on these references.

Independent claim 9 is directed to a system with similar features to claim 1, and independent claim 16 is directed to an apparatus with similar features to claim 1. For the reasons discussed above in connection with claim 1, independent claims 9 and 16 are similarly patentable over **Mukundan** and **Kanerva**, as are their respective dependent claims 10-15 and 17-20. As

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such, Applicants ask that the Examiner remove the obviousness rejection of claims 9-20 based on these references.

Conclusion

Applicants submit that all pending claims 1-20 are in condition for allowance, and ask that the Examiner issue a notice of allowance.

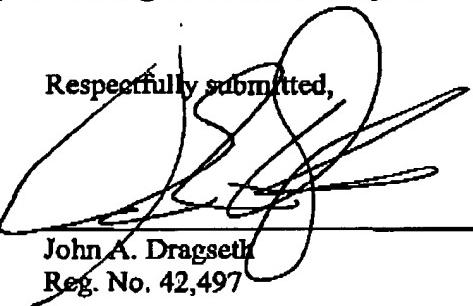
It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Examiner is authorized to charge the required petition for extension of time fee of \$450 to deposit account 06-1050. Please apply any other charges or credits to deposit account 06-1050.

Date:

9/14/06

Respectfully submitted,


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